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Attorneys for Richard A. Marshack, Trustee of the LPG Liquidation Trust

In re:

The Litigation Practice Group P.C.,

Debtor.

Chapter 11

Case No.: 8:23-bk-10571-SC

Adv. Proc. No.: 8:25-ap-01105-SC

Richard A. Marshack,  
Trustee of the LPG Liquidation Trust,

Plaintiff,

v.

World Global Fund, LLC, et al.

Defendants.

**Stipulated Request Between Plaintiff,  
Richard Marshack and World Global  
Fund, LLC, MNS Funding, LLC and  
SSD Investment Group, LLC to  
Temporarily Stay Proceedings and  
Continue all Associated Dates as related  
to Defendants World Global Fund, LLC,  
MNS Funding, LLC and SSD Investment  
Group, LLC**

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 West Fourth Street  
Santa Ana, CA 92701

1 The parties to the stipulation are Plaintiff, RICHARD A. MARSHACK in his  
2 capacity as the duly appointed Chapter 11 Trustee For The Bankruptcy Estate Of The  
3 Litigation Practice Group P.C. and Liquidating Trustee of the LPG Liquidation Trust  
4 (“Trustee”), and Defendants World Global Fund, LLC (a New York limited liability  
5 company), SSD Investment Group, LLC and MNS Funding, LLC, by and through their  
6 authorized representative, Shia Dembitzer.

7  
8  
9 RECITALS

10 A. The principal of World Global Fund, LLC, SSD Investment Group, LLC  
11 and MNS Funding, LLC is Shia Dembitzer.

12 B. An answer to the Trustee’s adversary proceeding complaint was due on  
13 April 14, 2025. In this complaint, the Trustee asserted that World Global Fund, LLC,  
14 SSD Investment Group, LLC, and MNS Funding, LLC, were all part of a Ponzi  
15 scheme which resulted in them receiving a portion of monies belonging to the Debtor  
16 up to approximately \$20,000,000.00.

17 C. On or about April 11, 2025, Mr. Dembitzer requested a stay of the case  
18 against World Global Fund, LLC and MNS Funding, LLC. Between that date and  
19 the date of this filing, attorneys for the Trustee verified that Mr. Dembitzer had  
20 authority to enter into this Stay on behalf of those entities. The Trustee has agreed  
21 to stay this proceeding against World Global Fund, LLC and MNS Funding, LLC  
22 to allow for the exchange of documents and information that may assist the  
23 Trustee’s recovery of the fraudulent transfers as alleged in the adversary proceeding  
24 complaint that arose from the assistance and participation in the Debtor’s fraud by  
25 these entities.

26 D. The Trustee also determined that a stay of SSD Investment Group, LLC  
27 was appropriate because Mr. Dembitzer is the authorized representative of SSD  
28 Investment Group, LLC and that entity possesses information likely to assist in  
providing meaningful resolution of claims made in the adversary proceeding

1 Complaint against it, as well. The Trustee will also require acknowledgement by  
2 Mr. Dembitzer, on behalf of World Global Fund, LLC, SSD Investment Group,  
3 LLC, and MNS Funding, LLC that the period that any stay is in effect will not be  
4 used as an opportunity to transfer or otherwise dissipate assets of the entities (the  
5 “Entity Assets”).

6  
7 **NOW THEREFORE, THE PARTIES STIPULATE AND AGREE AS**  
8 **FOLLOWS (SUBJECT TO COURT APPROVAL):**

9 1. The deadline for World Global Fund, LLC, SSD Investment Group,  
10 LLC and MNS Funding, LLC to file an answer to Trustee’s adversary proceeding  
11 complaint shall be stayed until October 14, 2025.

12 2. Dembitzer agrees that there will be no transfers of Entity Assets or  
13 any other kind of dissipation of Entity Assets. To the extent these entities are still  
14 operating, this Stay is conditioned upon the entities acting in good faith and  
15 acting in the ordinary course of business. For clarity, funds required for the  
16 ordinary course of business means the entities may use Entity Assets (including  
17 cash collateral) in the ordinary course of business, but expenditure of Entity  
18 Assets beyond 10% will require the consent of Trustee. Additionally, these  
19 entities will not sell, transfer, or dissipate shares of assets in other entities where  
20 they respectively maintain less than a controlling interest. Should an entity in  
21 which one of these entities has less than a controlling interest sell, transfer, or  
22 dissipate the respective share of assets, the entity which financially benefits  
23 from such sale, transfer or dissipation will, within five business days of such  
24 transaction, notify the Trustee through counsel of such transaction.


Respectfully submitted,  
DINSMORE & SHOHL LLP

By: /s/ Karen S. Hockstad  
Karen S. Hockstad

Dated: 05/30/2025


Attorneys for Richard A. Marshack, Trustee of the  
LPG Liquidation Trust

**World Global Fund, LLC**

By:   
Shia Dembitzer, its authorized representative


Dated: 05/21/2025

**SSD Investment Group, LLC**

By:   
Shia Dembitzer, its authorized representative

Dated: 05/21/2025

**MNS Funding, LLC**

By:   
Shia Dembitzer, its authorized representative

Dated: 05/21/2025

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**191 W. Nationwide Blvd., Suite 200, Columbus, Ohio 43215**

A true and correct copy of the foregoing documents: (1) **Stipulated Request Between Plaintiff, Richard Marshack and World Global Fund, LLC, MNS Funding, LLC and SSD Investment Group, LLC to Temporarily Stay Proceedings and Continue all Associated Dates as related to Defendants World Global Fund, LLC, MNS Funding, LLC and SSD Investment Group, LLC (a)** will be served or was served on the judge in chambers in the form and manner required by LBR 5055-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On May 30, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

christopher.Ghio@dinsmore.com; angelica.urena@dinsmore.com; karen.hockstad@dinsmore.com;  
kim.beavin@dinsmore.com; matthew.sommer@dinsmore.com; carrie.davis@dinsmore.com;  
Yosina.Lissebeck@Dinsmore.com; caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com;  
hwinograd@pszjlaw.com; ikharasch@pszjlaw.com; vnewmark@pszjlaw.com; hdaniels@pszjlaw.com;  
bdassa@pszjlaw.com; Richard A. Marshack (TR) ecf.alert+Marshack@titlexi.com; pkraus@marshackhays.com;  
hmosothoane@hinshawlaw.com; crico@hinshawlaw.com; bpaino@hinshawlaw.com; United States Trustee  
ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On May 30, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Scott C. Clarkson  
U.S. Bankruptcy Court, Central District California  
411 N. Fourth Street, Ctrm 5C  
Santa Ana, CA 92701

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on May 30, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 30, 2025  
Date

Karen S. Hockstad  
Printed Name

/s/ Karen S. Hockstad  
Signature

Funding Gateway, Inc.  
Mark Fuchs c/o The Corporation  
5314 16th Avenue, Suite 139  
Brooklyn, NY 11204

LPG Capital, LLC  
c/o Mendy Lipschitt  
10 Jill Lane  
Monsey, NY 10952

MNS Funding, LLC  
and each of its assumed names  
Mark Fuchs c/o File Right LLC  
5314 16th Avenue, Suite 139  
Brooklyn, NY 11204

SSD Investment Group, LLC  
14400 Bear Valley Rd., Space 527  
Victorville, CA 92394

World Global Fund, LLC  
and each of its assumed names  
c/o File Right LLC  
5314 16th Avenue, Suite 139  
Brooklyn, NY 11204

WORLD GLOBAL FUND, LLC n/k/a Glass Media, LLC  
Andrew Pierce  
c/o Cloud Peak Law  
1095 Sugar View Drive, Suite 500  
Sheridan, WY 82801

Funding Gateway, Inc.  
Mark Fuchs c/o File Right RA Services, LLC  
330 Changebridge Road, Suite 101  
Pine Brook, NJ 07058

Shia Dembitzer  
202 Foster Avenue, Apt. 5  
Brooklyn, NY 11230

SSD Investment Group, LLC  
c/o Natesh Singh Dole  
13745 Holt Ct.  
Victorville, CA 92394

SSD Investment Group, LLC  
Attn: Shia Dembitzer  
7901 4th Street N., Suite 5765  
St. Petersburg, FL 33702

Weinman and Associates, LLC  
Andrew Pierce  
c/o Cloud Peak Law  
1095 Sugar View Drive, Suite 500  
Sheridan, WY 82801

WORLD GLOBAL FUND  
Andrew Pierce  
c/o Cloud Peak Law  
1095 Sugar View Drive, Suite 500  
Sheridan, WY 82801